# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time:

October 6, 2004

Site Contact(s):

Dyan Foss

Phone:

303-994-0325

**Regulatory Contact:** 

Edd Kray

Phone:

303-994-3441

Agency:

**CDPHE** 

**Purpose of Contact:** Disposition of Building 707 C-pit

#### Discussion

C-pit is a basement constructed of cast-in-place concrete in Building 707. This area had contained a variety of tanks that were used to collect and clean spent solvent and machine oil from the foundry, casting and product assembly operations. This area also contained RCRA units 92.001 through 92.019 and associated secondary containment. RCRA closure concurrence is being obtained through Harlen Ainscough and documented in a separate Contact Record.

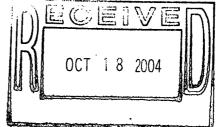
On September 1, 2004, the in process survey results for this area were provided to CDPHE. There is some residual contamination in C-pit, predominantly on the floor. The contamination ranges from 150 dpm/100 cm<sup>2</sup> to 1,500 dpm/100 cm<sup>2</sup>. There is one bolt in floor that is 200,000  $dpm/100 cm^2$ .

The proposed approach for removing this area after demolition is consistent with the approach in other facilities where aggressive decontamination methods have taken the contamination to the soils. In addition, aggressive decontamination or removal prior to demolition could result in the infiltration of groundwater into the building. ER has removed similar slabs and pits with no adverse impacts to the environment.

In preparation for demolition, this area will be encapsulated with a watertight product and marked for identification. In addition, the area will be evaluated structurally, and precautions taken, as necessary, with equipment movement over this area during demolition of the above grade structure. All of the structure will be removed, and the activity will be coordinated with ER to ensure that the soils beneath the structures are adequately evaluated prior to backfilling.

When presented with all of the survey information and proposed approach, CDPHE concurred that the disposition of this area should be consistent with the approach for the Building 778 slab and Buildings 731 and 732 and Section 4.4.7 of the Building 707 Decommissioning Operations Plan (DOP).

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This type of activity is addressed in the Building 707 DOP as contaminated building shell removal; however, a minor modification will be submitted to CDPHE to clarify this section of the DOP. Section 4.4.7 currently contains a sentence that reads, "Building 707 Closure Project POC and the DOE POC will consult with the LRA POC to determine whether contaminated portion of the shell should be removed prior to demolition." This sentence will be modified to read, "Building 707 Closure Project POC and the DOE POC will consult with the LRA POC to determine whether contaminated portion of the shell should be removed before or after demolition." The CDPHE representative agreed with this minor modification and that it is consistent with the intent of objective 7 in the Rocky Flats Cleanup Agreement, which is footnoted in Section 4.4.7 of the DOP.

The analysis required in this section of the DOP will be completed for all contaminated component/shell removal associated with the Building 707 Project as one analysis. In addition to this contact record, a memo documenting the areas of residual contamination, commitments and controls will be prepared for the RISS project prior to transferring the facilities for disposition.

## Contact Record Prepared By: Dyan Foss

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